

IN THE DISTRICT COURT

IN AND FOR THE COUNTY OF PITKIN

STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

MOTION TO IMPROVE
DEFENDANT'S CONDITIONS
OF CONFINEMENT IN THE

GARFIELD COUNTY JAIL

vs.

THEODORE R. BUNDY,

Defendant.

Comes now the Defendant, pro se, Theodore R. Bundy, and states as follows:

1. Since April 11, 1977, defendant has been confined in the Garfield County Jail in Glenwood Springs, Colorado. During this period he has been maintained in a kind of custody best described as maximum security isolation. The conditions have adversely affected his health, well-being, and state of mind. A more serious impact may be seen should defendant's strength and health reach levels too low for him to effectively conduct his own defense.
2. The circumstances and conditions of his confinement are violative of his Fourteenth Amendment right to be free from arbitrary restriction of liberty. In the same vain, his treatment contradicts the notion that he is innocent until proven guilty since he is presently being subjected to punishment without due process of law. Finally, the conditions to which defendant is currently subject amount to a breach of the Eighth Amendment prohibition against cruel and unusual punishment.

3. Defendant's particular grievances regarding his conditions of confinement are innumerable in the Affidavit In Support of this motion.

Wherefore, Defendant moves the court for an order directing the Garfield County Sheriff, Ed Hoge, to make the following improvements and supply the following provisions without delay:

1. A daily diet which includes:
 - (a) lunch,
 - (b) at least 2,600 calories,
 - (c) Recommended Daily Allowances (RDA) of protein, carbohydrates, fats, vitamins, and mineral (As established by the National Academy of Sciences.)
2. Sheets, pillow, pillow case and clean blanket.
3. Provision each day of a mop, broom and toilet cleaning material.
4. A writing and typing table.
5. At least two one-hour exercise periods each week permitted defendant outside his cell.
6. At least one, one-hour exercise period outside the jail in the fresh air and sunlight.
7. An end to the policy ordering other inmates not to talk to the defendant and punishing them if they do.
8. A battery powered radio to be supplied by defendant.
9. Multi-vitamin supplements and protein tablets to be supplied at defendant's expense.
10. Defendant be taken for a hair cut by a professional barber at his own expense immediately, and thereafter provision be made for a hair cut once a month.

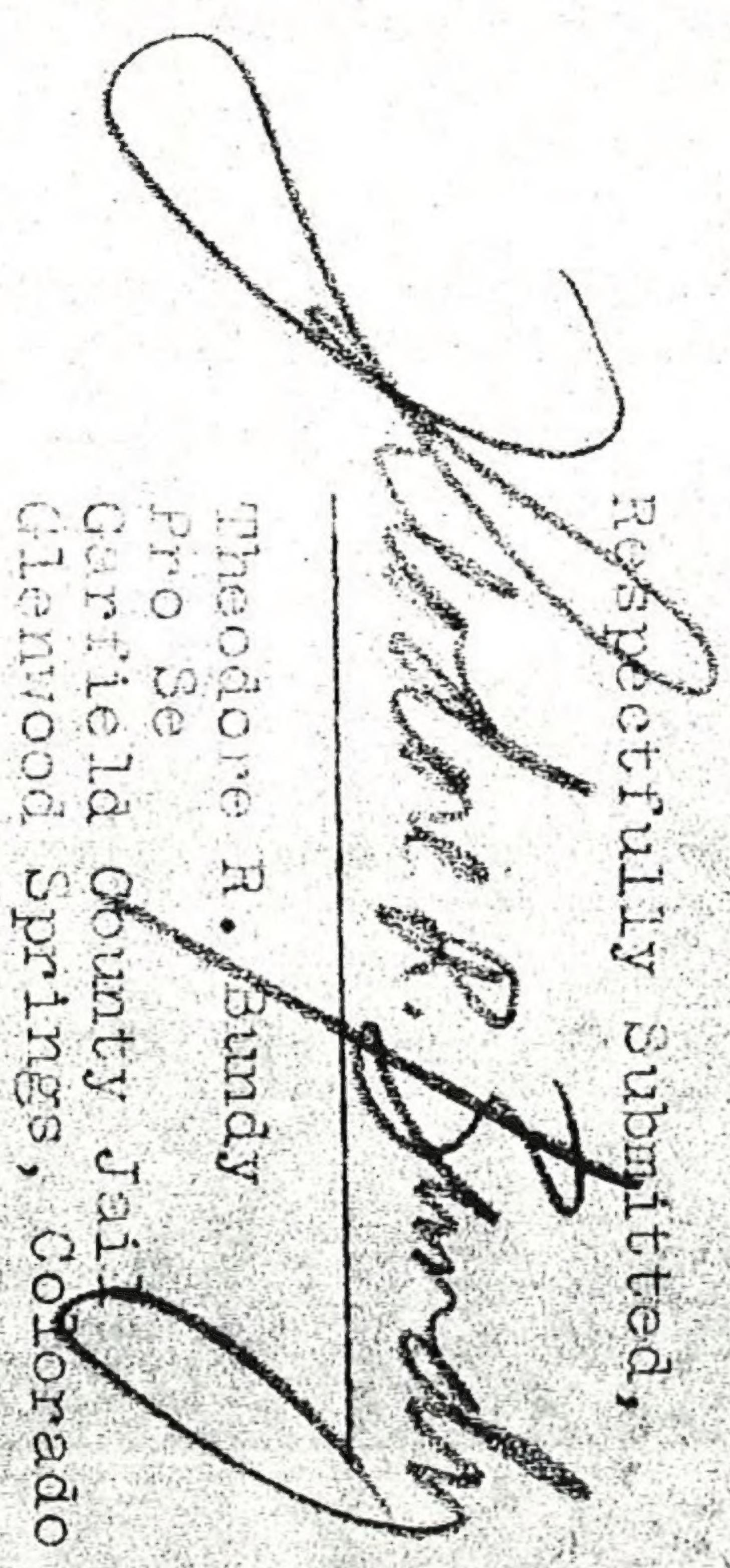
Motion To Improve Conditions.

Page 3.

Dated this 9th day of May, 1977


Respectfully Submitted,

Theodore R. Bundy
Pro Se
Garfield County Jail
Glenwood Springs, Colorado



Motion to Improve Conditions
Exhibit #1

Defendant's Cell GARFIELD County Jail



Approximate Layout of GARFIELD County Jail

Do Not Disturb

I HAVE BEEN
FEELING SICK AND
NEED THE SLEEP.

THANKS

ted.

Milt McClure

IN THE DISTRICT COURT

IN AND FOR THE COUNTY OF PITKIN

AND STATE OF COLORADO

FILED IN DISTRICT COURT

PITKIN COUNTY

ASPEN, COLORADO

Criminal Action No. C-1616

MAY 23 1977

SHERIFF W. DILLS, Clerk

THE PEOPLE OF THE

STATE OF COLORADO

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cleanliness at all times.

The defendant shall be issued a mop, broom and toilet cleaner at his request but no more frequently than every two days.

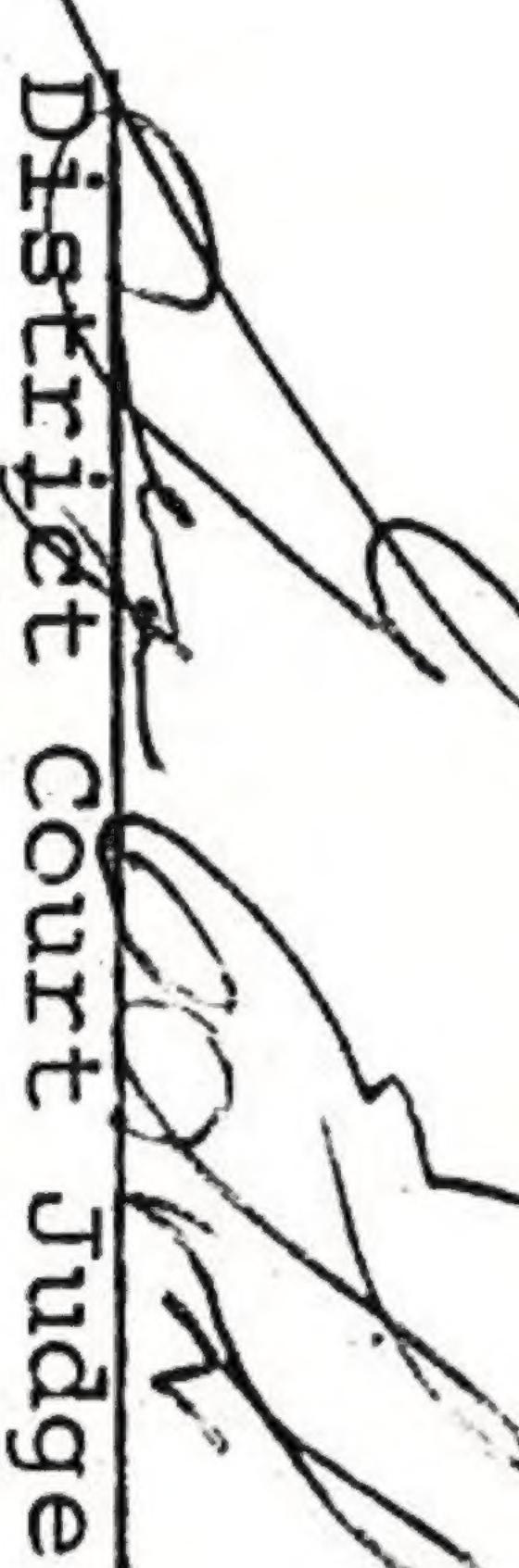
The defendant shall be allowed to have a battery powered radio in his jail cell to be provided by the defendant.

The defendant shall be allowed vitamin supplements to be provided at the defendant's expense.

The defendant shall be allowed a hair cut once a month. The timing of the hair cuts to be left at the discretion of the Sheriff.

So Ordered this 23rd day of May, 1977.

BY THE COURT



District Court Judge

IN THE DISTRICT COURT IN AND FOR THE
COUNTY OF PITKIN AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE STATE)
OF COLORADO.)

vs.)

THEODORE R. BUNDY,)

Defendant.)

CERTIFICATE OF
MAILING

I hereby certify that on the 2nd day of May, 1977,
I mailed, in properly addressed and stamped envelopes,
by United States Regular mail a copy of MOTION TO EXCLUDE
THE PUBLIC FROM PRETRIAL EXCLUSIONARY (SUPPRESSION)

HEARINGS; MOTION TO CONTINUE FILING DATES AND HEARING
DATES FOR PRE-TRIAL SUPPRESSION MOTIONS; MOTION FOR THE
APPOINTMENT OF AN EXPERT IN HUMAN HAIR ANALYSIS AND FOR
ESTABLISHMENT OF A PROCEDURE TO GATHER AND TEST HUMAN

HAIR SPECIMENS; MOTION FOR DISCRETIONARY DISCLOSURES;
MOTION FOR THE PUBLIC DEFENDER TO DISCLOSE CASE FILES
AND DOCUMENTS TO DEFENDANT; LETTER TO JUDGE LOHR AND

DESIGNATION OF PARTIES FOR MAILING LIST OR CERTIFICATE
to each of the following persons at the address noted,
to-wit:

Charles G. Leidner, Esq.
Public Defender
310 Ninth Street
Glenwood Springs, Colorado 81601

Mr. Thomas B. Kelley
Yegge, Hall and Evans
1340 Denver Club Bldg.
Denver, Colorado 80202

District Attorney's Office
506 East Main Street
Aspen, Colorado 81611

Mr. John Kane
Attorney at Law
United bank Building
1700 Broadway
Denver, Colorado 80203

Shirley M. Dill
Clerk of the District Court

By Michael J. McCloskey

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Theodore Bundy
Garfield County Jail

Re: Supplies

Date: 5/11/77

- ✓ 1. One doz. $8\frac{1}{2}$ x 14 legal note pads
/hole
- ✓ 2. Two binder clips (The kind used to hold papers in legal files.)
Need about 60.
- ✓ 3. One doz. 10 x 15 mailing envelopes
- ✓ 4. Mailing labels for above listed envelopes.
- ✓ 5. Box of paper clips
- ✓ 6. Full size ledger-type appointments calendar - Not available in plywood
- ✓ 7. Roll of 13 cent stamps - See Administrators ruling